

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

COAST TO COAST TITLE, LLC; SOL  
CITY TITLE, LLC; MAGNOLIA TITLE  
ARKANSAS, LTD.; MAGNOLIA TITLE  
FLORIDA, LLC; THE PEABODY  
BULLDOG LLC; AND JOHN MAGNESS

*Plaintiffs,*

v.

TYRRELL L. GARTH; PHILLIP H.  
CLAYTON; DEBBIE MERRITT A/K/A  
DEBORAH MERRITT; MATTHEW D.  
HILL; P. GARRETT CLAYTON;  
SCOTT M. REEVES; ARIANE E.  
YOUNG; STARREX TITLE FLORIDA,  
LLC; LAURIE COOPER;  
MARKETSTREET CAPITAL  
PARTNERS, LLC; MARKETSTREET  
CAPITAL PARTNERS AR, LLC; AND  
BRIAN A. BREWER

*Defendants.*

CIVIL ACTION NO. 4:24-cv-02767

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DEFENDANTS TYRRELL L. GARTH AND PHILLIP H. CLAYTON'S  
CERTIFICATE OF INTERESTED PARTIES

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Pursuant the Court's Order for Conference and Disclosure of Interested Parties, the undersigned counsel of record certifies that in addition to the named parties, the following persons, associations, firms, partnerships, corporations, affiliates, parent corporations, or other entities, including any unincorporated entities such as LLCs or LLPs, are financially interested in the outcome of this litigation:

1. All Parties
2. HMH Title Investments, LLC, Partial Owner of One or More Plaintiffs
3. HMH Lifestyles, L.P. d/b/a HistoryMaker Homes
4. BNMJR, Inc., Manager of HMH Title Investments, LLC
5. B. Nelson Mitchell, Jr.
6. GF Insurance Investments, LLC, Partial Owner of One or More Plaintiffs
7. Alphabet Investments, LLC, Partial Owner of One or More Plaintiffs
8. Rabbit Food, LLC, Partial Owner of One or More Plaintiffs
9. Sol City Title Managers, LLC, Partial Owner of One or More Plaintiffs
10. Sarah Blackburn, Manager/Owner of Rabbit Food, LLC
11. Beau Blackburn, Owner of Rabbit Food, LLC
12. 405 Manhattan Investments, LLC, Partial Owner of One or More Plaintiffs
13. Superior Am Cap Investments, LLC

These representations are made in order that the Judge of this Court may evaluate possible disqualification or recusal. Defendants Garth and Clayton certify that they will file an amended Certificate of Interested Parties should any new parties, persons, firms, partnerships, corporations, affiliates, parent corporations, or other entities that are financially interested in the outcome of this litigation be identified during the pendency of this litigation.

Dated: November 28, 2024

Respectfully submitted,

**BECK REDDEN LLP**

By: /s/ Fields Alexander  
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**ATTORNEYS FOR DEFENDANTS  
TYRRELL L. GARTH AND  
PHILLIP H. CLAYTON**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 28, 2024, I served the foregoing notice via the CM/ECF system, which will provide notice to all parties of record.

By: /s/ Kaitie Sorenson  
Kaitie Sorenson